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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY  
MELANIE HARATUNIAN  
JOEL BERNSTEIN  
JANICE OBUCHOWSKI, OF COUNSEL

July 7, 1993

BY HAND DELIVERY

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Ex Parte Meeting Regarding RM-8004,  
ET Docket No. 92-9, RM 7981

Dear Mr. Caton:

On July 6, 1993, on behalf of Northern Telecom Inc. ("Northern Telecom"), the undersigned and Mr. Raymond Strassburger of Northern Telecom met with Mr. Bruce Franca, Mr. Rodney Small and Mr. David Siddall to discuss issues raised in conjunction with the petition for rulemaking filed by Alcatel Network Systems, Inc. ("Alcatel").

Northern Telecom reiterated the importance of preserving the availability of wide band channels in the 4 GHz and 6 GHz band. Wide band channels are highly spectrum efficient, and are used for important services, including the provision of interexchange and SONET services. Northern Telecom thus fully supports the recent comments of MCI, which demonstrated extensive usage of the spectrum for wide band systems.

Northern Telecom is concerned that mixing wide band and narrow band systems, as suggested in the Alcatel proposal, would result in the blocking of wide band systems by less efficient narrow band systems. Northern Telecom had previously presented a channelization plan that would accommodate the narrow band users without "cannibalizing" the wide band channels. Northern Telecom also believes that 40 MHz wide band systems can coexist with satellite users. Northern Telecom


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recognizes the need for coordination, but based on its experiences in Canada, believes that such coordination can be achieved.

Finally, Northern Telecom expressed concern that the Rules proposed by Alcatel establish different minimum "fill" percentages for initial usage for wide band and narrow band systems. The Alcatel proposal would establish a 25% factor for narrow band systems, while imposing a 90% or 75% factor for wide band systems. Northern Telecom believes that the initial factors should be the same, while recognizing that additional percentage of capacity milestones could be imposed as the system is used over time.

Northern Telecom fully supports the Commission's efforts to establish Personal Communications Services ("PCS"), and recognizes that the accommodation of relocated 2 GHz users is a necessary part of PCS deployment. While it is important that the Commission move ahead expeditiously with PCS, it is also important that the Commission do so in a manner that does not jeopardize the tremendous benefits of wide band systems.

Sincerely,

  
Stephen L. Goodman  
Counsel for Northern Telecom Inc.

cc: Bruce Franca  
Rodney Small  
David Siddall